Case 1:12-cv-00348-ALC-MHD Document 11 Filed 03/26/1

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ELENA IZKHAKOV, : ECF Case

Plaintiff, : 12 Civ. 0348 (ALC)(MHD)

-against-

: NOTICE OF MOTION
: TO ADMIT COUNSEL
AL COMMISSION FOR : PRO HAC VICE

EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL GRADUATES,

Defendant. :

To: Christopher E. Chang, Esq.
Law Offices of Christopher E. Chang
140 Broadway, 46th Floor
New York, New York 10005

Barry L. Black Law Offices of Barry Black, P.C. 479 South Oyster Bay Road Plainview, NY 11803

PLEASE TAKE NOTICE that upon the annexed Affirmation of Heather L. Hopkins in support of this Motion and the Certificate of Good Standing annexed thereto, we will move this Court before the Honorable Andrew L. Carter, at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York for an Order allowing the admission of Margaret E. Rodgers Schmidt, a member of the law firm MORGAN, LEWIS & BOCKIUS LLP and a member in good standing of the Bar of the Commonwealth of Pennsylvania, as attorney *pro hac vice* to argue or try this case in whole or in part.

Dated: March 26, 2012

MORGAN, LEWIS & BOCKIUS LLP

Heather L. Hopkins (HH-6839) 101 Park Avenue New York, New York 10178 (212) 309-6779

hhopkins@morganlewis.com
Attorney for the Educational Commission
for Foreign Medical Graduates

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ELENA IZKHAKOV,

Plaintiff,

Plaintiff,

-against
AFFIRMATION OF

HEATHER L. HOPKINS

EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES,

MOTION TO ADMIT
COUNSEL PRO HAC
VICE

Defendant. :

HEATHER L. HOPKINS, an attorney admitted to practice in the Courts of the State of New York and this court, affirms as follows under the penalties of perjury:

- 1. I am associated with the law firm of Morgan, Lewis & Bockius LLP, counsel to Defendant the Educational Commission for Foreign Medical Graduates ("ECFMG") in this action. I make this application in support of ECFMG's motion to admit Margaret E. Rodgers Schmidt *pro hac vice* to appear on behalf of ECFMG in this action.
- 2. Ms. Schmidt is a resident of Pennsylvania and is a member of the law firm of Morgan, Lewis & Bockius LLP. Her office address is 1701 Market Street, Philadelphia, PA 19103.
- 3. As shown in the Certificates of Good Standing annexed hereto, Ms. Schmidt is a member in good standing of the Bar of the Commonwealth of Pennsylvania.
- 4. Ms. Schmidt has not been disciplined by any Court or any administrative body, nor is she the subject of any pending disciplinary proceeding.
- 5. Prior to filing this Motion, Ms. Schmidt conferred with opposing counsel who has indicated that they do not intend to oppose ECFMG's Motion.

WHEREFORE ECFMG respectfully submits that Margaret E. Rodgers Schmidt be permitted to appear as co-counsel and advocate for ECFMG.

Dated: March 26, 2012

MORGAN, LEWIS & BOCKIUS LLP

Heather L. Hopkins (HH-6839) 101 Park Avenue

New York, New York 10178 (212) 309-6779

hhopkins@morganlewis.com

Attorney for the Educational Commission

for Foreign Medical Graduates

UNITED STATES DISTRICT COURT

| SOUTHERN DISTRICT OF NEW YORK | | |
|-------------------------------|--------|----------------------------------|
| ELENA IZKHAKOV, | X : | ECF Case |
| Plaintiff, | : : | 12 Civ. 0348 (ALC)(MHD) |
| -against- | : : | |
| | : | [PROPOSED] ORDER GRANTING MOTION |
| EDUCATIONAL COMMISSION FOR | : | TO APPEAR |
| FOREIGN MEDICAL GRADUATES, | : | PRO HAC VICE |
| | : | |
| Defendant. | : : | |
| | Х | |

WHEREAS, on March 26, 2012, Defendant the Educational Commission for Foreign Medical Graduates, moved this Court for an order to admit Margaret E. Rodgers Schmidt to appear *pro hac vice* to appear on behalf of it in this action, it is hereby

ORDERED that, Margaret E. Rodgers Schmidt is admitted *pro hac vice* to appear on behalf of Defendant the Educational Commission for Foreign Medical Graduates.

| Dated: March, 2012 | |
|--------------------|---|
| | Andrew L. Carter United States District Judge |



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Margaret E. Rodgers Schmidt, Esq.

DATE OF ADMISSION

November 10, 2005

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal Dated: March 23, 2012

otricia A. Johnson Chief Clerk

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

-----X

ELENA IZKHAKOV, : ECF Case

Plaintiff, : 12 Civ. 0348 (ALC)(MHD)

-against-

AFFIRMATION OF

SERVICE

EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL GRADUATES,

:

Defendant.

HEATHER L. HOPKINS, an attorney admitted to practice in the Courts of the State of New York and this court, affirms under penalty of perjury that on this 26th day of March, 2012, I caused true and correct copies of the foregoing Notice of Motion to Admit Counsel *Pro Hac Vice*, Affirmation of Heather L. Hopkins in Support of Motion to Admit Counsel *Pro Hac Vice*, Certificate of Good Standing and Proposed Order to be delivered to counsel of record for Plaintiff via Federal Express:

Christopher E. Chang, Esq. Law Offices of Christopher E. Chang 140 Broadway, 46th Floor New York, New York 10005

Barry L. Black Law Offices of Barry Black, P.C. 479 South Oyster Bay Road Plainview, NY 11803 Dated: March 26, 2012

MORGAN, LEWIS & BOCKIUS LLP

Heather L. Hopkins (HH-6839) 101 Park Avenue

New York, New York 10178 (212) 309-6779

hhopkins@morganlewis.com
Attorney for the Educational Commission

for Foreign Medical Graduates